

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

Royce J. Hassell

Debtor.

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CASE NO. 19-30694

ROYCE J. HASSELL'S AMENDED WITNESS AND EXHIBIT LIST

(Relates to Docket No. 78, 81, 88, 91)

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| Main Case No: 19-30694 | Name of Debtor: Royce J. Hassell |
| Witnesses: | Judge: Marvin Isgur |
| 1. Royce J. Hassell (fact and expert) | Hearing Date: January 14, 2020 |
| 2. Silvia T. Hassell | Hearing Time: 9:30 a.m. |
| 3. Eric Campbell (fact and expert) | Party's Name: Royce J. Hassell |
| 4. Any witness called by another party; and, | Attorney's Name: Erin E. Jones |
| 5. Any witness necessary for rebuttal or impeachment. | Attorney's Phone: 832-529-1999 |
| | Nature of Proceeding: <ul style="list-style-type: none"> • <i>HCCI Motion to Appoint Trustee</i> (Docket No. 78) • <i>Debtor Objection to HCCI Motion to Appoint Trustee</i> (Docket No. 85) • <i>Elbar Motion to Convert</i> (Docket No. 81) • <i>Debtor Objection to Elbar Motion to Convert</i> (Docket No. 98) • <i>Hanover Joinder</i> (Docket No. 88) • <i>Debtor Objection to Hanover Joinder</i> (Docket No. 100) • <i>Debtor's Motion to Sell</i> (Docket No. 91) |

EXHIBITS

| Ex. # | Description | Offered | Objection | Admitted/ Not Admitted | Disposition |
|-------|---|---------|-----------|------------------------|-------------|
| 1. | Objection to HCCI Motion to Appoint Trustee (Docket No. 85) | | | | |
| 2. | Objection to Elbar Motion to Convert (Docket No. 98) | | | | |
| 3. | Objection to Hanover Joinder (Docket No. 100) | | | | |

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| 4. | Notice of Re-Set Hearing (Docket No. 97) | | | | |
| 5. | Application to Employ Coldwell Banker/Eric Campbell (Docket No. 82) | | | | |
| 6. | Notice of Corrected Exhibit A – Listing Agreement (Docket No. 105) | | | | |
| 7. | Order Authorizing Employment of Coldwell Banker/Eric Campbell (Docket No. 108) | | | | |
| 8. | Application to Employ Coldwell Banker/Beverly Smith (Docket No. 90) | | | | |
| 9. | Motion to Sell 6421 Buffalo Speedway | | | | |
| 10. | Financing Approval Letter | | | | |
| 11. | James C. Hassell Lien Releases | | | | |
| 12. | Chubb Policy - Vacancy | | | | |
| 13. | Insurance Declarations | | | | |
| 14. | [Intentionally Left Blank] | | | | |
| 15. | Objection to Claim of Hanover Insurance Company (Docket No. 99) | | | | |
| 16. | Objection to Claim of Pendergraft & Simon (Docket No. 101) | | | | |
| 17. | Objection to Claim of Locke Lord (Docket No. 102) | | | | |
| 18. | Objection to Claim of HCCI (Docket No. 99) | | | | |
| 19. | Objection to Claim of Total Lime (Docket No. 110) | | | | |
| 20. | Objections to Claims of Hassell Siblings (Docket No. ____ to ____) | | | | |
| 21. | Objection to Claim of Argos (Docket No. 118) | | | | |

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| 22. | Order Denying Remand (Docket No. 16, Adv. 19-03452) | | | | |
| 23. | Memorandum Opinion(Docket No. 17, Adv. 19-03452) | | | | |
| 24. | Second Amended Plan and Disclosure Statement (Docket No. 120) | | | | |
| 25. | Montgomery County – Proof of Claim No. 3 – WITHDRAWN | | | | |
| 26. | Harris County – Proof of Claim No. 1 | | | | |
| 27. | Harris County – Proof of Claim No. 3 | | | | |
| 28. | Claims Register | | | | |
| 29. | Docket Sheet Case No. 19-30694 | | | | |
| 30. | <i>Motamehdi v. Hassell</i> Pleadings – Case No. 2014-00928 (125 th Judicial District Court Harris County) | | | | |
| 31. | 6417 Buffalo Speedway – HAR.com Listing | | | | |
| 32. | 6421 Buffalo Speedway – HAR.com Listing | | | | |
| 33. | Elbar Investment Inc. Proof of Claim No. 15 | | | | |
| 34. | 6417 Buffalo Speedway Appraisal Dated 9/13/17 | | | | |
| 35. | 6421 Buffalo Speedway Appraisal Dated 9/13/17 | | | | |
| 36. | 6421 Buffalo Speedway HCAD | | | | |
| 37. | 6417 Buffalo Speedway HCAD | | | | |
| 38. | HCAD Comps on Buffalo Speedway | | | | |
| 39. | HAR.com Comps on Buffalo Speedway | | | | |
| 40. | Listing History and Comps | | | | |

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| 41. | Settlement Motions – Jasso, Procon, Tejano Trucking - WITHDRAWN | | | | |
| 42. | RJH Resume | | | | |
| 43. | Notice of Hearing on Sale Motion (Docket No. 116) | | | | |
| | Any exhibits listed by any other party and/or any exhibits listed for any other hearing set for the same date. | | | | |
| | Any exhibits necessary for rebuttal, impeachment or refreshing the recollection of witnesses. | | | | |
| | Any additional exhibits used for demonstrative purposes only. | | | | |

Royce J. Hassell reserves the right to supplement or amend the proposed exhibits as necessary and for purposes of rebuttal or impeachment. Royce J. Hassell reserves the right to use or introduce any exhibit designated by any other party as necessary. Royce J. Hassell reserves the right to amend or supplement its witness list as necessary and for purposes of rebuttal or impeachment. Royce J. Hassell reserves the right to use or designate any witness designated by any other party.

Dated: January 13, 2020.

Respectfully submitted,

By: /s/ Erin E. Jones

Erin E. Jones

Texas Bar No. 24032478

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COUNSEL FOR DEBTOR-IN-POSSESSION, ROYCE J. HASSELL

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of January, a copy of the foregoing witness and exhibit list was served upon all parties registered to receive electronic notice of filings in this case through the Court's ECF notification system as set forth below.

/s/ Erin E. Jones